

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD)	
)	
and)	
)	
ALISON DREITH,)	
)	
<i>on behalf of themselves and a class of</i>)	
<i>similarly situated individuals,</i>)	No. 4:17-cv-2455
)	
Plaintiffs,)	
)	
v.)	
)	
CITY OF ST. LOUIS, MISSOURI,)	
)	
Defendant.)	

DECLARATION OF DEMETRIUS THOMAS

I, Demetrius Thomas, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.
2. I work as a videographer.
3. On the evening of September 17, 2017, I was driving in downtown St. Louis and saw what seemed to me like a parade of police officers marching by. I was curious what was happening.
4. I parked my vehicle and got out to film the marching police. The video I took the evening of September 17, 2017, is a true and accurate depiction of what I observed.
5. As I was walking down a sidewalk with my camera out, I heard one officer yell to another officer, "EVERYONE IS GOING TO JAIL."
6. I only heard the officer because I was very close to him.

7. The officers gave no directive to disperse, but when I heard that remark, I decided to return to my vehicle and leave.

8. When I got back to my vehicle, it was surrounded by police and they would not let me enter. Officers told me to “Move, walk that way!” and pointed another direction. The officer also lifted up a can of mace as if he was about to spray me. I complied and jogged away.

9. Again, I heard no order or warning to disperse and no declaration that I was part of an unlawful assembly.

10. I was unarmed, and I did not commit any crime nor pose any threat to any person or property.

11. There were so many police officers, and they were wearing riot gear and gas masks. They were carrying long batons, and they continuously hit the batons against the ground in a rhythmic way that was very intimidating.

12. As I had already complied with the police order to walk in a certain direction, I tried to approach my vehicle from the way they had directed me to, but there were more officers blocking every possible route back.

13. Officers eventually cornered me and many others at the intersection of Washington and Tucker. We tried to exit the area but were blocked by police on all sides, and officers on bikes pushed us back toward the riot police.

14. I was pushed onto the ground by the police.

15. They closed in and sprayed me and other pedestrians with chemical agents.

16. I heard no warning that officers would deploy chemicals.

17. I saw officers continue to spray people at point-blank range even after everyone was on the ground.

18. One police officer hit me in the ribs with his baton even as other officers were dragging me toward the sidewalk.

19. When I was pushed onto the ground, dragged by the police, and they tried to force my professional-grade camera equipment away from me, my equipment was damaged, dented, and scratched. The officer broke the \$800 detachable lens I had been using. The lens will not focus, and I cannot work until I am able to replace my equipment.

20. I observed the police taking pictures of the protesters, observers, journalists, and pedestrians they had surrounded on their own cameras and phones.

21. Along with many others, I was arrested and transported to jail.

22. I never broke any law and I complied with all of the police commands.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 28th day of September, 2017.

By: /s/ Demetrius Thomas
Demetrius Thomas